

**Weaver, Craig**  
**Page 1 of 2**

--- Forwarded by Susan K Kozacek/R3/USDAFS on  
10/16/2003 06:04 PM -----  
craig weaver <craig@cybervault.com>  
10/14/2003 05:30 PM

To: skozacek@fs.fed.us  
cc:  
Subject: Tucson Electric Power Sahuarita-Nogales  
Transmission line DEIS  
October 14, 2003

Sue Kozacek

Acting Forest Supervisor  
Coronado National Forest  
300 W. Congress  
Tucson, AZ 85701

RE: Tucson Electric Power Sahuarita-Nogales Transmission  
line DEIS

Dear Ms. Kozacek,

1 | I'm writing to object to the plan by Tucson Electric and  
| Power to construct the Sahuarita-Nogales Transmission Line.

Having lived near the Palo Verde Nuclear Generating  
Station in Wintersburg Arizona I've seen the negative results  
of power lines crossing wild lands. Problems like habitat  
fragmentation and roads that are built during power pole  
construction and are never abandoned or reclaimed plus the  
destruction of the visual landscape, that makes the  
southwest so unique, are a few of the issues I've witnessed  
first hand.

**Comment No. 1**

The Federal agencies note the commentor's opposition to the proposed project.

**Comment No. 2**

Sections 3.1 and 4.1 present a description of the existing land use and recreation, and analyze the potential impacts to these resources.

**Comment No. 3**

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project.

Sections 3.1 and 4.1 present a description of the existing land use, and analyze the potential impacts to these resources from the proposed project.

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Weaver, Craig  
Page 2 of 2

2 Further I feel the negative impacts on the Tumacacori and Atascosa Mountains and this region in general would be significant and would adversely affect everyone's enjoyment of this natural environment in a multitude of ways. (Power lines which traverse the Tonopah Desert west of Phoenix certainly provide many examples of ruined vistas, fragmented habitats, and lost natural character of that region.)

3 Further my experience makes me believe that this new power line proposal is incompatible with protection of the region's wildlife and wilderness characteristics. I support the no action alternative and further study to identify methods to meet the specific energy needs of Santa Cruz County only.

4 With options for regional power generation (like the new power house at Bowie AZ) I feel this power line proposal is less about meeting the needs of residents in Santa Cruz County and more about exporting power to Mexico. The public's interest in protecting natural areas has been demonstrated by strong support for Monuments, County Preserves, and similar citizen initiatives. The long-term public interest is best served by denying this proposal.

5 I favor the No Action alternative and feel all options for meeting the energy needs of Santa Cruz County should be reviewed before moving forward with this power line project. Please protect this important region by withdrawing the Draft Environmental Impact Statement.

Sincerely,

Craig Weaver  
3601 N. 411 Ave  
Tonopah AZ 86354

#### Comment No. 4

The ACC is vested with the state's authority to decide how it believes energy should be furnished within Arizona's borders (for example, the need for and effectiveness of transmission lines within its borders). Refer to the revised text in Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona Corporation Committee, that provides explanation of the jurisdictions and authorities of the state and Federal agencies, and their relationship to this NEPA analysis.

#### Comment No. 5

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

**Whitaker, Linda**  
**Page 1 of 2**

----- Forwarded by Susan K Kozacek/R3/USDAFS on  
10/16/2003 05:34 PM -----  
lin@theriver.com  
10/11/2003 08:11 AM

To: skozacek@fs.fed.us  
cc:  
Subject: Environmental Impact Statement for Tucson  
Electric Power's proposed 345 kilovolt powerline

Ms. Sue Kozacek  
Coronado National Forest  
Federal Building, 300 West Congress  
Tucson, AZ 85701

Dear Ms. Kozacek,

1 Please do NOT support the current draft Environmental  
Impact Statement for Tucson Electric Power's (TEP)  
proposed 345 kilovolt powerline.

2 TEP's proposed "Western Route" and "Crossover Route"  
will forever scar the irreplaceable landscape of the  
Tumacacori area. This area contains several roadless areas  
as well as a citizen's proposed Wilderness area home to  
many unique species of animals, birds, bats and plants. A  
jaguar was sighted in this area only two years ago.

3 The important goal of providing fully reliable electrical  
service to the city of Nogales and Santa Cruz County must  
be achieved. Unfortunately, instead of building the small  
transmission line necessary to achieve this goal, TEP has  
proposed a massive and environmentally destructive  
powerline designed to export power to Mexico.

#### **Comment No. 1**

The Federal agencies note the commentor's opposition to the Draft EIS.

#### **Comment No. 2**

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

#### **Comment No. 3**

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

**Whitaker, Linda**  
**Page 2 of 2**

- 4 | I've lived in this area for many years and do not want the  
destruction of my environmental and cultural heritage.
- 5 | I urge DOE to issue a new draft EIS which fully and  
rigorously explores all available options-including a local  
power plant and smaller power lines which would not serve  
Mexico-to meet the important public interest of providing  
reliable energy service to Santa Cruz County.

Sincerely,

Linda Whitaker  
1520 E. Bristol Dr  
Nogales, Arizona 85621

**Comment No. 4**

Chapter 3 presents a description of the existing environment and Chapter 4 analyzes the potential impacts to these resources from the proposed project, including potential impacts to cultural resources (Sections 3.4 and 4.4). The Federal agencies are developing a Programmatic Agreement with the Arizona State Historic Preservation Office (SHPO), interested tribes, and TEP guiding the treatment of cultural resources if an action alternative is selected. Prior to ground-disturbing activities in any approved corridor, a complete on-the-ground inventory would be conducted by professional archaeologists in accordance with provisions of Section 106 of the National Historic Preservation Act (NHPA). Efforts to identify cultural resources would also include historical document research and continued consultation with Native American tribes regarding potential traditional cultural properties and sacred sites. Identified cultural resources would be evaluated in terms of National Register eligibility criteria and potential project effects in consultation with all parties who are participants in the Programmatic Agreement.

Wherever possible, power poles, access roads, and any other ground-disturbing activities would be placed to avoid direct impacts to cultural resources. A professional archaeologist would assist the pole-siting crew in avoiding impacts to cultural resource sites. In cases where avoidance of sites is not feasible, a site-specific Treatment Plan and Data Recovery Plan would be developed in consultation with tribes, the appropriate land-managing agencies, and the Arizona SHPO. These plans will include an appropriate Plan of Action to implement the Native American Graves Protection and Repatriation Act. A Discovery Plan would be developed to establish procedures to be followed in the event of discovery of unanticipated cultural resources, and a Monitoring Plan would address issues of site protection and avoidance.

**Comment No. 5**

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide

**Comment No. 5 (continued)**

whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

**Wrenn, George**  
**Page 1 of 1**

From: gwrenn@ucla.edu  
Sent: Wednesday, October 15, 2003 3:07 PM  
To: Pell, Jerry  
Subject: Environmental Impact Statement for Tucson Electric Power's proposed 345 kilovolt powerline

Dr. Jerry Pell  
U.S. Department of Energy, Office of Fossil Energy (FE-27)  
1000 Independence Avenue. SW Washington, DC 20585

Dear Dr. Pell,

I would like to comment on the current draft Environmental Impact Statement for Tucson Electric Power's and Citizens Communications' proposed 345,000-volt transmission line. The proposed "Western Route" and alternative "Crossover Route" would permanently scar the remote Tumacacori Highlands in Southeast Arizona, including several roadless areas and important wildlife habitat. I urge the Department of Energy to withdraw the proposed draft because it does not address alternatives to this massive transmission line that would provide reliable electrical service to Nogales and Santa Cruz County without destroying the environment and cultural artifacts. The Department of Energy should issue a new draft Environmental Impact Statement that includes alternatives such as a local power plant and smaller power lines that would not serve Mexico.

Thank you.  
Sincerely,

George Wrenn  
13250 Chandler Boulevard  
Sherman Oaks, California 91401-6018

**Comment No. 1**

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

**Comment No. 2**

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives which include the full spectrum of alternatives that would satisfy the applicant's proposal.

**Comment No. 2 (*continued*)**

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

Wright, Anthony  
Page 1 of 1

5 October 2003  
Anthony Wright  
P.O. Box 495  
Price, UT 84501


Sue Kozacek  
Acting Forest Supervisor  
Coronado National Forest  
300 W. Congress  
Tucson, AZ 85701

**Subject:** Draft EIS for Tucson Electric Power Sahuarita-Nogales Transmission Line

Dear Ms. Kozacek,

- 1 The DEIS does not include several viable, and in my opinion preferable, alternatives such as the use of a smaller transmission line in existing powerline ROW's along with local backup generation capability. My main concern is that the preferred alternative will reduce the value of the Tumacacori and Atacosa Mountains as a biological corridor for both plants and animals.
- 2 Under the most likely climate change scenarios, this corridor will assume even more importance in the next 100 years. Unless you somehow envision substantially increasing budgets for enforcement of road closures and appropriate mitigation, I suggest you not grant special use permits for the western and crossover routes.
- 3

Sincerely,

  
Anthony Wright

#### Comment No. 1

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

#### Comment No. 2

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources, including potential impacts to biological resources in the Tumacacori and Atacosa Mountains.

#### Comment No. 3

Regarding the effectiveness of road closures, any authorization issued to implement the proposed project on the Coronado National Forest would contain terms and conditions to ensure road barrier effectiveness and maintenance, as appropriate.

**Wyeth, Nathan**  
**Page 1 of 1**

----- Forwarded by Susan K Kozacek/R3/USDAFS on  
10/16/2003 05:14 PM -----  
nayythan@hotmail.com  
10/09/2003 08:36 PM

To: skozacek@fs.fed.us  
cc:  
Subject: Environmental Impact Statement for Tucson  
Electric Power's proposed 345 kilovolt powerline

Ms. Sue Kozacek  
Coronado National Forest  
Federal Building, 300 West Congress  
Tucson, AZ 85701

Dear Ms. Kozacek,

1 I am writing to urge you to withdraw the current draft  
Environmental Impact Statement for Tucson Electric  
Power's proposed 345 kilovolt powerline.

2 You need to consider the alternatives to the routing which  
has been proposed, which is unacceptable. Too many  
American landscapes have been crudely bisected by  
powerlines like these before, and there is nearly always a  
better way to do it than the initial proposal made by  
whatever energy conglomerate is involved.

Sincerely,

Nathan Wyeth  
4717 Falstone Ave  
Chevy Chase, Maryland 20815

**Comment No. 1**

The commentor's opinion to withdraw the Draft EIS is noted.

**Comment No. 2**

Section 1.2 explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

**Yamate, Madeline**  
**Page 1 of 1**

Tucson Electric Power Powerline EIS

From: XSPAWS@aol.com [SMTP:XSPAWS@aol.com]  
To: Pell, Jerry  
Cc:

Subject: Tucson Electric Power Powerline EIS  
Sent: 10/15/2003 12:09 PM  
Importance: Normal

Dr. Jerry Pell

U.S. Department of Energy, Office of Fossil Energy (FE-27)  
1000 Independence Avenue, SW Washington, DC 20585

Dear Dr. Pell,

1 | Tucson Electric Power's proposed 345 kilovolt powerline  
will carve up some of the last remote and wild areas in  
Southeast Arizona. I write to ask you to withdraw the  
project's draft Environmental Impact Statement. The  
proposed route crosses the Tumacacori Highlands, home of  
many rare and endangered species, and an area which still  
holds many roadless areas. Santa Cruz County certainly  
2 | does needs reliable electric service, but that service can be  
provided by a much smaller powerline project than that  
which TEP has proposed. The draft EIS does not contain  
any alternatives to the proposed powerline. The line has far  
more capacity than needed just to serve Santa Cruz County.  
TEP needs to scale back to a more reasonable proposal.

Sincerely,  
Madeline Yamate  
90 Arlington Ave.  
Kensington, California 94707

**Comment No. 1**

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to the endangered, threatened and special status species.

**Comment No. 2**

A smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

## **2.4 Bulk Emails**

**Bulk Email #1**

**Page 1 of 2**

**From:** joemoye@email.com [SMTP:joemoye@email.com]  
**To:** Pell, Jerry  
**Cc:**  
**Subject:** Tucson Electric Power/ 345 kilovolt powerline  
**Sent:** 10/9/2003 10:48 PM **Importance:** Normal

Dr. Jerry Pell  
 U.S. Department of Energy, Office of Fossil Energy (FE-27)  
 1000 Independence Avenue. SW  
 Washington, DC 20585

Dear Dr. Pell,

1

Please withdraw the current draft Environmental Impact Statement for Tucson Electric Power's proposed 345 kilovolt powerline.

2

TEP's proposed "Western Route" and alternative "Crossover Route" would carve through some of the most remote and wild areas in Southeast Arizona, forever scarring the beautiful and irreplaceable landscape of the Tumacacori Highlands. This area contains several roadless areas as well as a citizen's proposed Wilderness area home to black bears, Mexican spotted owls, lesser-long nosed bats and peregrine falcons as well as lesser known species such as the Sonora chub, Mexican vine snake, elegant trogon and the Gentry indigo bush. A jaguar was sighted in this area only two years ago.

3

The important goal of providing fully reliable electrical service to the city of Nogales and Santa Cruz County must be achieved. Unfortunately, instead of building the small transmission line necessary to achieve this goal, TEP has proposed a massive, environmentally destructive, and extremely controversial powerline designed to export power to Mexico.

4

The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require huge increases to consumers' electricity bills.

5

The recent blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not corporate private profits. I urge DOE to issue a

**Note:** A total of 1,029 copies of this email, or a substantively very similar email, were received by either DOE or USFS. In addition, DOE and USFS received multiple emails and letters that included all or part of this email along with additional comments, and a copy of each of these emails and letters is reproduced in Section 2.3 of this CRD with the corresponding responses.

**Comment No. 1**

The commentor's request to withdraw the current Draft EIS is noted.

**Comment No. 2**

The Federal agencies recognize that many people value certain areas along the alternative transmission corridors as wild places and have a holistic concern for the natural beauty, undisturbed landscape features, and abundant plant and animal wildlife that characterize those areas. These unique natural characteristics give such wild areas their "sense of place," which includes people's visual and aural perceptions of the area's undisturbed sky, natural landscape, water resources, and plant and animal populations. The sense of place also includes the spiritual value that many people associate with these wild areas because of their cultural and religious significance. The Federal agencies recognize and appreciate this holistic sense of place and have revised the introductory sections of Chapters 3 and 4 of the Final EIS to acknowledge these values.

Clearly, the natural and cultural characteristics that contribute to a sense of place transcend the consideration of individual resource areas in a NEPA document. However, in order to analyze potential impacts effectively and document the analysis, it is necessary to consider the resource areas individually. Thus, the EIS discussions of affected environment in Chapter 3 and potential impacts in Chapter 4 are divided into distinct resource areas (e.g., visual resources, biological resources, cultural resources).

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

2.4-1

**Bulk Email #1**  
**Page 2 of 2**

5  
cont.

new draft EIS which fully and rigorously explores all available options-including a local power plant and smaller power lines which would not serve Mexico-to meet the important public interest of providing reliable energy service to Santa Cruz County.

Sincerely,

Joseph Moye  
4522 Moore Circle #C3  
Tallahassee, Florida 32304

1

**Comment No. 2 (continued)**

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

The federal agencies are aware that environmental groups are interested in achieving federal wilderness designation for a large portion of the Tumacacori Ecosystem Management Area (EMA). Maps provided by commentors indicate that all corridor alternatives considered in this EIS cross the area suggested for wilderness designation. Presence of a transmission line would not necessarily preclude wilderness designation, as the Wilderness Act of 1964 and Forest Service regulations (36 CFR 293.15) allow for the existence, establishment and subsequent maintenance of transmission lines in wilderness areas. Information about the wilderness proposal has been added to Section 5.2.4 of the FEIS as a potential future action.

**Comment No. 3**

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

**Comment No. 4**

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

After a regulated utility such as TEP constructs a project in Arizona, the ACC determines whether or to what degree an investment by a utility is recoverable through consumer electricity rates. Because the Federal agencies cannot anticipate how the ACC may adjust consumer electricity rates in light of the proposed project, the potential change in consumer electricity rates is too speculative for inclusion in the EIS. There have been no rate increases attributable to this proposed project.

**Comment No. 5**

A new power plant in Nogales is not a viable alternative to a new, second transmission line. Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. Section 2.1.5, Alternatives Considered but Eliminated From Further Analysis, was revised to provide additional information regarding these alternatives that were dismissed from detailed analysis.

**Bulk Email #2**

**Page 1 of 2**

Tucson Electric Power Sahuarita-Nogales Transmission line DEIS

From: David Scott Silverberg, Ph.D. [SMTP:silverberg87571@yahoo.com]  
To: Pell, Jerry  
Cc:

Subject: Tucson Electric Power Sahuarita-Nogales Transmission line DEIS  
Sent: 10/13/2003 6:35 PM  
Importance: Normal  
Dr. Jerry Pell  
Office of Fossil Energy  
U.S. Department of Energy  
Washington D.C. 20585  
Jerry.Pell@hq.doe.gov  
FAX: 202-318-7761

Dear Dr. Jerry Pell

My comments are regarding the "Tucson Electric Power Sahuarita-Nogales Transmission line DEIS"

- 1 | · The preferred Western Route is the longest, most expensive, and most environmentally damaging of all alternatives considered. The Crossover route is equally terrible.
- 2 | · The Western and Crossover routes slice through a citizen's proposed Wilderness Area and would forever scar the outstanding natural characteristics of the area.
- 3 | · There is no "Need" stated for a 345 kV line by either the applicant (TEP) or agencies – because most of the energy transmitted on the line would not benefit Santa Cruz County, why is the 345 kV, and not a smaller line, needed?
- 4 | · A smaller, less obtrusive powerline, such as a 115 kV line was not considered for any route. Why not? A 115 kV line is cheaper, can more easily be buried in sensitive areas near homes, and would serve the long-term needs of Santa Cruz County.
- 5 | · I do not support the proposed routes because they do not serve Santa Cruz County's interests, as originally intended under ACC order 62011. They are an unnecessary economic, environmental, and culture burden on Southern Arizona. Please consider withdrawing the Draft Environmental Impact Statement and issuing an assessment that properly analyzes real solutions to power needs in Santa Cruz County that include a smaller powerline and/or locally run power plant.

**Note:** A total of 9 copies of this email, or a substantively very similar email, were received by DOE. In addition, DOE received two emails and letters that included all or part of this email along with additional comments, and a copy of each of these emails and letters is reproduced in Section 2.3 of this CRD with the corresponding responses.

**Comment No. 1**

The Federal agencies recognize that many people value certain areas along the alternative transmission corridors as wild places and have a holistic concern for the natural beauty, undisturbed landscape features, and abundant plant and animal wildlife that characterize those areas. These unique natural characteristics give such wild areas their "sense of place," which includes people's visual and aural perceptions of the area's undisturbed sky, natural landscape, water resources, and plant and animal populations. The sense of place also includes the spiritual value that many people associate with these wild areas because of their cultural and religious significance. The Federal agencies recognize and appreciate this holistic sense of place and have revised the introductory sections of Chapters 3 and 4 of the Final EIS to acknowledge these values.

Clearly, the natural and cultural characteristics that contribute to a sense of place transcend the consideration of individual resource areas in a NEPA document. However, in order to analyze potential impacts effectively and document the analysis, it is necessary to consider the resource areas individually. Thus, the EIS discussions of affected environment in Chapter 3 and potential impacts in Chapter 4 are divided into distinct resource areas (e.g., visual resources, biological resources, cultural resources).

The affected environment of the Western and Crossover Corridors is described in Chapter 3, and the potential environmental impacts (including socioeconomic impacts) from these alternatives are fully evaluated in Chapter 4.

**Comment No. 2**

The federal agencies are aware that environmental groups are interested in achieving federal wilderness designation for a large portion of the Tumacacori Ecosystem Management Area (EMA). Maps provided by commentators indicate that all corridor alternatives considered in this EIS

**Bulk Email #2**  
**Page 2 of 2**

With best wishes,

David Scott Silverberg, Ph.D.  
5710 South Freeman Road #4  
Tucson, AZ 85747 USA

520-245-3711

silverberg@alum.mit.edu

**Comment No. 2 (continued)**

cross the area suggested for wilderness designation. Presence of a transmission line would not necessarily preclude wilderness designation, as the Wilderness Act of 1964 and Forest Service regulations (36 CFR 293.15) allow for the existence, establishment and subsequent maintenance of transmission lines in wilderness areas. Information about the wilderness proposal has been added to Section 5.2.4 of the FEIS as a potential future action.

Section 4.3.2, Vegetation and Wildlife, states that the long-term reductions in biological activity (e.g., lack of vegetation in an area due to construction traffic) tend to be more pronounced in arid areas such as the proposed project area where biological communities recover very slowly from disturbances.

**Comment No. 3**

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current ("AC") transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system located in Sonora, Mexico." In an applicant-driven process, such as TEP's proposed project, the range of reasonable alternatives analyzed in detail in the EIS is directly related to the applicant's purpose and need.

**Comment No. 3 (con't)**

A smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. Section 2.1.5, Alternatives Considered but Eliminated From Further Analysis, was revised to provide additional information regarding this alternative that was dismissed from detailed analysis.

**Comment No. 4**

ACC Decision No. 62011 (ACC 1999) mandates the construction of a second transmission line to serve customers in Santa Cruz County, and does not reference the export of electricity to Mexico. However, a second ACC order (Decision No. 64536, issued in January 2002) grants a CEC to TEP to construct only a 345-kV transmission line with the dual purpose of addressing the service reliability problems in Santa Cruz County and providing interconnection with Mexico. TEP's stated purpose and need for the proposed project is a dual purpose and need of benefiting both southern Arizona and Mexico.

**Comment No. 5**

A new power plant in Nogales is not a viable alternative to a new, second transmission line. Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. Section 2.1.5, Alternatives Considered but Eliminated From Further Analysis, was revised to provide additional information regarding these alternatives that were dismissed from detailed analysis.

## **2.5 Multiple Signatory Letters**

**Multiple Signatory Letter #1**  
**Page 1 of 2**

Sue Kozacek  
 Acting Forest Supervisor  
 300 W. Congress St  
 Tucson, AZ  
 85701

Re: "Tucson Electric Power Sahuarita-Nogales Transmission line DEIS and needed Forest Plan Amendments"

Dear Ms Kozacek,

1 We the below signed believe that the Tumacacori and Atacosa Mountains are an exceptional area for primitive recreation. This powerline is incompatible with the natural characteristics there.

We enjoy bird watching, hiking, biking, canyoneering, hunting, picnicking, etc in the area affected by the powerline and would be negatively affected by the construction of the powerline in the Western and Crossover Routes.

2 TEP proposes to build 20 new miles of road for the Preferred Route. Road density in the Tumacacori EMA is already above acceptable limits as set forth in the current Forest Plan. More road building, even with associated closures (often unsuccessful) would violate the Forest Plan.

3 A Forest Plan Amendment would only decrease the already dwindling supply of remote recreational experiences in the region and would impact many sensitive wildlife and plant species that are an important aspect of our southern Arizona heritage.

4 We urge you to deny any special use permits for the Western and Crossover Routes because these plans are not compatible with the current uses of the affected area.

Sincerely,

NAME ADDRESS SIGNATURE

F. From Bailey 5819 E. NORTH ST Tucson AZ

Rosario Abreu 540 S. Irving Ave, Tucson, AZ 85711

Sue C. Cashy-Bennett 2801 W. Clearview Dr, Tucson, AZ, 85745

**Comment No. 1**

Sections 3.1.2 and 4.1.2 discuss existing recreational settings and activities, and analyze potential impacts to recreation from the proposed project. Section 4.1.2 specifically evaluates impacts to ROS indicators such as remoteness and naturalness, both of which would have changes that are "inconsistent" with the existing ROS classes for much of the length of the Western and Crossover Corridors within the Coronado National Forest. Analysis of the proposed Forest Plan amendments is contained in Appendix H.

**Commentor No. 2**

The Tumacacori EMA of the Coronado National Forest in and of itself does not exceed road density limits set forth in the Forest Plan. Road density limits set forth in the Forest Plan are for the Coronado National Forest as a whole, not for individual land units or EMAs within the Coronado National Forest.

Regarding the effectiveness of road closures, any authorization issued to implement the proposed project on the Coronado National Forest would contain terms and conditions to ensure road barrier effectiveness and maintenance, as appropriate. Based on these terms and conditions for ensuring the effectiveness of road closures, the proposed project is consistent with Forest Plan standards and guidelines for road density.

**Comment No. 3**

Refer to the response to Comment 1 above regarding the impacts of a Forest Plan amendment.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to endangered, threatened and special status species.



**Multiple Signatory Letter #2**  
**Page 1 of 2**

**Comment Nos. 1-5**

Refer to the responses to Comments 1-5, respectively, in Bulk Email #2.

Dr Jerry Pell  
 Office of Fossil Energy  
 US Department of Energy  
 Washington DC  
 20585

Re: "Tuscon Electric Power Sahuarita-Nogales Transmission line DEIS"

Dear Sir,

- 1 | We the below signed believe that the preferred Western route and Crossover routes are the longest, most expensive and environmentally damaging of the alternatives considered.
- 2 | The western and crossover routes slice through a citizen's proposed Wilderness Area and would forever scar the outstanding natural characteristics of the area.
- 3 | There is NO "need" stated for a 345kV line by either the applicant (TEP) or agencies; because most of the energy transmitted on the line would not benefit Santa Cruz County, why is the 345kV and not a smaller line needed?  
 A smaller, less obtrusive 115kV powerline was not considered for any route. Why not? A 115 kV line is cheaper, can more easily be run along existing utility corridors and buried near homes, and would serve the long term needs of Santa Cruz County.
- 4 | I do not support the proposed routes because they do not serve Santa Cruz County's interests, as originally intended under ACC order 62011. They are an unnecessary economic, environmental, and cultural burden on southern Arizona. Please consider withdrawing this Draft Environmental Impact Statement and issuing a new assessment that properly analyzes real solutions to power needs in Santa Cruz County and includes a smaller powerline and/or locally run power plant.
- 5 |

Sincerely,

NAME	ADDRESS	SIGNATURE
E FLOA DALLS	5829 E. NORTH ST TUCSON, AZ	<i>[Signature]</i>
Seres Costy-Bennett	2801 W Clearview Dr. Tucson, AZ 85745	<i>[Signature]</i>
Adonna Rometo	5441 N Swan Rd. Apt. 114 Tucson, AZ 85718	<i>[Signature]</i>

## Multiple Signatory Letter #2

Page 2 of 2

NAME	ADDRESS	SIGNATURE
Adriana Romero	5441 N. Swan Rd. Apt 114 Tucson, AZ 85714	<i>Adriana Romero</i>
Elena Antonio	9102 E. Kings Rd. Tucson AZ 85711	<i>Elena Antonio</i>
Jennifer Huang	405 E. Prince Rd Apt #1018 Tucson AZ 85705	<i>Jennifer Huang</i>
Zili Liu	3636 N. Campbell 85719	<i>Zili Liu</i>
Cathy Van Zanten	3250 E. Fairmount Tucson 85710	<i>Cathy Van Zanten</i>
Ralph Fregosi	8241 E. Ciruela Del Oro Tucson, AZ 85750	<i>Ralph Fregosi</i>
Joey Mandala	4809 E. Cima La Branca 85718	<i>Joey Mandala</i>
Wol Mandala	4809 E. Cima La Branca 85718	<i>Wol Mandala</i>
Ray St	5829 E. NORTH ST TUCSON AZ 85712	<i>Ray St</i>